REMARKS

Claim 1 calls for a digital-to-analog converter followed by an analog-to-digital converter and then use of a compression block to compensate for errors introduced by the digital-to-analog and analog-to-digital converters by performing a localized motion search. No reference, including Youn, has anything to do with digital-to-analog or analog-to-digital conversion. There is no mention or reference of any type in Youn of digital-to-analog or analog-to-digital conversion. Moreover, there is no discussion of errors produced by these and no suggestion whatsoever that a localized motion search could be used to correct such errors.

To the contrary, the sole reason why Youn says he can use the same motion vectors is when the effect of the term "$\Delta^c_f(i, j) - \Delta^p_s(i+m, j+n)$ in equation 5 is negligible then "performing a new motion estimation would give the same motion vector as the incoming motion vector." See Youn at page 32, left column, first full paragraph.

None of these two terms have any applicability in the case of analog-to-digital or digital-to-analog conversion. The text makes it clear that these two terms are related to the quantization step size Q2 in the transcoder shown in Figure 1 and the quantization step size Q1 in the front encoder shown in Figure 1. Thus, they have no applicability to analog-to-digital or digital-to-analog conversion and there is no basis, from equation 5, to conclude that the result applicable there would apply in the case not involving quantization step size differences, but resulting from analog-to-digital and digital-to-analog conversion in series. Therefore, there is no rationale to apply Youn's solution to the different problems solved in the present application. As a result, reconsideration would be appropriate.

Respectfully submitted,

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